

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

JONATHAN SHORTALL,)	
)	
Plaintiff,)	No. 08 C 3493
vs.)	
)	Judge Norgle
CITY OF CHICAGO,)	
)	Magistrate Judge Cole
Defendant.)	

**DEFENDANT'S MOTION
FOR AN EXTENSION OF TIME TO ANSWER OR OTHERWISE PLEAD**

Defendant City of Chicago ("the City") by its attorney, Mara S. Georges, Corporation Counsel of the City of Chicago, moves this Court for an extension of time, up to and including September 5, 2008, to answer or otherwise plead to plaintiff's Complaint. In support of this motion, the City states the following:

1. On June 18, 2008, plaintiff filed a five-count complaint against the City, alleging violations of federal and state law in connection with the 2006 Police Sergeant Examination, part of which was administered while he was on military duty in Iraq.
2. The complaint was served on June 27, 2008.
3. Senior Counsel Jay M. Kertez received the Complaint on July 16, 2008 and filed his appearance in this case on July 17, 2008. Assistant Corporation Counsel will be assigned to represent the City.
4. The City's answer or other pleading to plaintiff's Complaint is due on July 17, 2008.
5. The City's counsel will need time to confer with their client, investigate the claims and obtain pertinent documents.

6. For these reasons, the City will need an extension of time, up to and including September 5, 2008, to answer or otherwise plead.

7. This motion is not being made for the purpose of delay or any other unlawful purpose.

8. Plaintiff will not be prejudiced if the requested extension of time is granted.

WHEREFORE, Defendant City of Chicago requests that this Court grant it an extension of time through September 5, 2008 to answer or otherwise plead to plaintiff's Complaint.

Respectfully submitted,

MARA S. GEORGES
Corporation Counsel of the
City of Chicago

By: /s Jay M. Kertez
JAY M. KERTEZ
Senior Counsel

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Suite 1020
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CERTIFICATE OF SERVICE

I hereby certify that I have caused to have a true and correct copy of the foregoing Notice of Motion and Defendant's Motion for an Extension of Time to Answer or Otherwise Plead to be electronically mailed to the attorney named in the foregoing notice on this 17th day of July 2008.

s/Jay M. Kertez
JAY M. KERTEZ
Senior Counsel